

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,

Plaintiff,

Civil Action No. 15-7116
(PKC)
ECF CASE

v.

**BENJAMIN WEY,
NEW YORK GLOBAL GROUP,
TIANYI WEI,
MICHAELA WEY,
ROBERT NEWMAN,
WILLIAM UCHIMOTIO, and
Seref Dogan Erbek,**

Defendants,

and

**ADVANTAGE CONSULTANTS, LTD.,
YORK CAPITAL MANAGEMENT, LTD.,
FOUR TONG INVESTMENTS, LTD.,
STRONG GROWTH CAPITAL, LTD.,
MEDIAN ASSETS INVESTMENTS, LTD., and
HAN HUA, LTD.,**

Relief Defendants.

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NOTICE OF MOTION TO INTERVENE

TO ALL PARTIES AND THEIR COUNSEL:

PLEASE TAKE NOTICE that Morelli Law Firm, PLLC, attorneys for proposed Intervenor-Plaintiff Hanna Bouveng, will move this Court, before the Honorable P. Kevin Castel, Courtroom 11D, in the United States District Court for the Southern District of New York, at 500 Pearl Street, New York, New York 10007, for an Order granting her the right to intervene in this

action as of right pursuant to Fed. R. Civ. P. 24(a), or, alternatively, for permissive intervention pursuant to Fed. R. Civ. P. 24(b). Pursuant to Rule 24(c), proposed Intervenor-Plaintiff Hanna Bouveng has attached her proposed Complaint-In-Intervention.

PLEASE TAKE FURTHER NOTICE that counsel for the moving party shall rely upon the accompanying Memorandum of Law in Support of Motion to Intervene, the proposed Complaint In Intervention and exhibits attached thereto, and all pleadings and exhibits previously filed in this action.

WHEREFORE, Hanna Bouveng respectfully requests that this Court enter an Order:

1. Granting Hanna Bouveng's Motion to Intervene;
2. Adding Hanna Bouveng to the caption of this action as a full party plaintiff-intervenor;
3. Directing the Clerk of Court to enter Hanna Bouveng's Complaint-in-Intervention, and allowing Hanna Bouveng to proceed on all her claims stated therein.

Dated: New York, New York
December 11, 2015

Respectfully Submitted,

/s/ Benedict P. Morelli
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